REMARKS

Referring to the Office action mailed March 26, 2008, Applicants have carefully studied the Examiner's rejections to the pending claims, and have amended claims 15 and 27 accordingly. Each of the amendments to the subject claims are adequately supported in the originally filed specification and shown in the corresponding figures.

Claims 15-18, 25, 26, and 27-30, stand rejected under 35 U.S.C. § 102(b) as anticipated by Johnson et al. (US 6,424,804). The rejection of the aforementioned claims is hereby traversed in view of the following discussion and amendments to independent claims 15 and 27. The Examiner indicates that Johnson et al. discloses a system having a mounting structure 32, within a body and doors 51. The system has a platform 14 where a camera/sensor 12 is mounted, linear guide 24 that is engaged by the platform that is a linear structure disposed in parallel to the linear movement path of the platform, and mechanism 30, 31 for moving the

platform. The Examiner further indicates that the camera 12 is directly attached to the platform 14 as shown in Figure 6. The alleged linear guide is connected to the mounting structure at a first end and to the platform at the second end. The alleged linear guide is engaged by an annular engagement structure 26 that is connected to the platform and to stabilize the platform in an atmosphere. Applicants respectfully submit, however, that Johnson et al. does not describe or suggest such a combination.

In particular, Johnson et al. does not describe or suggest a linear guide engaged by *any* annular engagement structure connected to the platform, which engages a threaded screw, as required by amended claims 15 and 27. Johnson et al. does describe linear bearings 26, which are not the structural or functional equivalent of the annular engagement structure (element 122 - Figure 2) of Applicants' invention. The linear bearings 26 are positioned *around* the periphery of the tracking plate 14 of Johnson et al. and are not connected to the platform 14, which

engages a threaded screw, to stabilize and direct linear movement of the platform in an atmosphere as in Applicants' invention.

Moreover, as shown and described in Johnson et al., the alleged linear guide 24 is not a linear guide, but rather functions structurally as a subassembly or frame member that protrudes into the atmosphere without the added protection of a linear guide. The linear guide of Applicants' invention is a stabilizer over and above the subassembly or frame member of Johnson et al. in that the former helps to prevent deflection of the platform when the platform is extended into an atmosphere.

Applicants further submit in Johnson et al. the camera/sensor 12 is not mounted to the tracking plate 14, but rather sleeve 34 is attached to the bottom of the tracking plate 14 as shown in Figure 5. The sleeve 34 attaches to the camera protective housing of the camera/sensor 12. Applicants' invention is not shown by Figure 5 or described with respect to Figure 5.

Further, unlike Applicant's invention, Johnson et al. does not teach the use of "a linear guide connected to the mounting structure at a first end of the linear guide and connected to the platform at a second end of the linear guide, wherein the linear guide is engaged by an annular engagement structure connected to the platform, which engages a threaded screw, . . ." Accordingly, Applicants have amended claims 15 and 27 to reflect the aforementioned differences between Applicants' invention and Johnson et al.

Claims 19-24 and 31-36 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Johnson et al. The Examiner indicates as for the mechanism that is electrically, hydraulically, magnetically, pneumatically, linear motion screw, or clutch and brake driven, it would have been obvious to one skilled in the art to have used any mechanism that is needed to drive the platform. However, Johnson et al. does not disclose "a linear guide connected to the mounting structure at a first end of

the linear guide and connected to the platform at a second end of the linear guide, wherein the linear guide is engaged by an annular engagement structure connected to the platform, which engages a threaded screw, . . .", as required by independent claims 15 and 27. Accordingly, favorable reconsideration and withdrawal of this rejection is respectfully requested.

Claims 19-24 and 31-36 depend on independent claims 15 and 27, respectively, as traversed above, and, thus, the rejection with respect to them is moot.

Applicant respectfully requests that the Examiner consider the amendments to the claims and pass this case to issue.

Respectfully submitted,

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